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July 6, 2021

Via ECF

The Honorable Cathy L. Waldor
Martin Luther King Jr. Courthouse
50 Walnut Street, Room 4040, Courtroom 4C
Newark, NJ 07101

RE: Sun Chemical Corporation v. American International Group, Inc., et al.
Docket No.: 2:20-cv-6252-SRC-CLW
MDMC File No.: A0014-1743

Dear Judge Waldor:

This firm represents Defendants American Home Assurance Company, improperly pleaded as American Home Insurance, and National Union Fire Insurance Company of Pittsburgh, Pa. (in its own right and as successor-in-interest to Landmark Insurance Company) (collectively, "Defendants") in the above-captioned matter filed by Sun Chemical Corporation ("Plaintiff").

On behalf of Defendants, and with Plaintiff's consent, the undersigned respectfully requests an adjournment of the July 8, 2022, scheduling conference due to conflicts that preclude the undersigned and my colleague, Laurence McHeffey, Esq., from being able to participate. We have conferred with Plaintiff's attorneys, and jointly request that the scheduling conference be rescheduled to a date in mid-August, if convenient for the Court. We apologize for the inconvenience.

Based on the existing case management deadlines, we have also conferred with Plaintiff's attorneys regarding a two-month extension of all current deadlines. In that regard, a separate joint letter will be submitted to the Court in the next few days requesting the extension and setting forth the basis for the extension request.

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Should the Court have any questions or require additional information, please do not hesitate to contact the undersigned or counsel for Plaintiff.

Respectfully submitted,

McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP

/s/ Kevin MacGillivray
KEVIN MACGILLIVRAY

cc: All Counsel of Record (via ECF Notification and e-mail)